

Control Number: 49737



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Addendum StartPage: 0

2019 SEP 23 PM 2:56

APPLICATION OF SOUTHWESTERN §  
ELECTRIC POWER COMPANY FOR §  
CERTIFICATE OF CONVENIENCE § BEFORE THE STATE OFFICE  
AND NECESSITY AUTHORIZATION § OF  
AND RELATED RELIEF FOR THE § ADMINISTRATIVE HEARINGS  
ACQUISITION OF WIND GENERATION §  
FACILITIES §

**CITIES ADVOCATING REASONABLE DEREGULATION'S  
THIRD SET OF REQUESTS FOR INFORMATION TO  
SOUTHWESTERN ELECTRIC POWER COMPANY**

Cities Advocating Reasonable Deregulation's ("CARD") Third Set of Requests for Information ("RFIs") to Southwestern Electric Power Company ("SWEPCO") is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at 816 Congress Avenue, Suite 950, Austin, Texas 78701, within twenty (10) days of service hereof or no later than **October 3, 2019**, or as modified by Order. Exhibit A is attached hereto and incorporated herein for all purposes.

**DEFINITIONS**

1. "SWEPCO," the "Company," and "Applicant" refer to Southwestern Electric Power Company and its affiliates.
2. "You," "yours," and "your" refer to SWEPCO (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.
4. The term "communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning

110

the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of SWEPCO.

5. "Identification" of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of SWEPCO or in the custody of its attorneys or other representatives or agents.
6. "Identification" of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. "Person" refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

## INSTRUCTIONS

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.
4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If SWEPCO considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned

counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if SWEPCO objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.

6. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if SWEPCO receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

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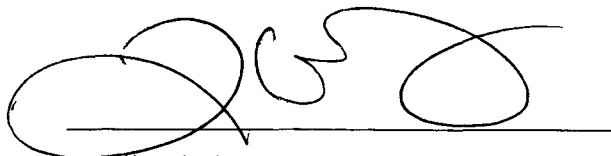
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**ATTORNEYS FOR CITIES ADVOCATING  
REASONABLE DEREGULATION**

### CERTIFICATE OF SERVICE

I certify that I have served a copy of ***CARD's Third Set of Requests for Information to SWEPCO*** upon all known parties of record by fax and/or first class mail on this the 23th day of September 2019.



Leslie Lindsey

**EXHIBIT A**

**SOAH DOCKET NO. 473-19-6862  
PUC DOCKET NO. 49737**

<b>APPLICATION OF SOUTHWESTERN</b>	<b>§</b>	
<b>ELECTRIC POWER COMPANY FOR</b>	<b>§</b>	
<b>CERTIFICATE OF CONVENIENCE</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>AND NECESSITY AUTHORIZATION</b>	<b>§</b>	<b>OF</b>
<b>AND RELATED RELIEF FOR THE</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>
<b>ACQUISITION OF WIND GENERATION</b>	<b>§</b>	
<b>FACILITIES</b>	<b>§</b>	

**CITIES ADVOCATING REASONABLE DEREGULATION'S  
THIRD SET OF REQUESTS FOR INFORMATION TO  
SOUTHWESTERN ELECTRIC POWER COMPANY**

- 3-1. Provide the estimated congestion costs for each wind energy resource included in the bid evaluation analysis for the wind energy RFP that led to the selection of the proposed wind energy resources.
- 3-2. Provide the estimated average annual SPP on-peak and off-peak energy prices for each year of the bid evaluation analysis for the wind energy RFP that led to the selection of the proposed wind energy resources.
- 3-3. Provide the forecasted annual carbon prices for each year of the bid evaluation analysis for the wind energy RFP that led to the selection of the proposed wind energy resources and provide the underlying assumptions and basis for such forecasts.
- 3-4. Provide the actual basis differentials between NYMEX Henry Hub price and price of gas delivered to the SWEPCO system for each of the last five calendar years.
- 3-5. Identify all testimony filed by any SWEPCO witnesses during the last five calendar years addressing natural gas and/or energy price hedging issues.
- 3-6. Identify any alternatives to the proposed wind energy resources proposed in this case evaluated by SWEPCO to hedge future natural gas and/or energy prices.
- 3-7. Provide the base case natural gas, coal and carbon price forecasts used for SWEPCO's most recent IRP.

- 3-8. Provide the forecasted annual energy production (MWh), annual market revenues, and total delivered cost of energy from each of the proposed wind energy facilities for each year the forecasted life of the facilities, with congestion costs and PTCs separately identified.
- 3-9. Provide SWEPCO's capacity ownership, and the annual average capacity factor and average annual net generation for the P50, P95 and P99 cases for SWEPCO's proposed ownership of the Wind Catcher project and for SWEPCO's share of the wind energy facilities proposed in this case.
- 3-10. Provide the forecasted annual average cost (\$/MWh) and average market energy revenue (\$/MWh) for each of the proposed wind energy facilities for each year of the Base Case Without CO2 scenario analyzed by SWEPCO.
- 3-11. Provide the forecasted annual average cost (\$/MWh) and average market energy revenue (\$/MWh) for SWEPCO's share of the wind facilities proposed in this case for each year of the base case analysis supporting acquisition of the facilities.
- 3-12. Provide the capital cost including AFUDC for SWEPCO's share of the Wind Catcher project without the tie line.
- 3-13. Provide the base case revenue requirements including any associated congestion costs for SWEPCO's share of the proposed wind energy facilities in this case and for SWEPCO's share of the previously proposed Wind Catcher project (including the tie line) for each year of the base case analyses for these projects.
- 3-14. Provide the Wind Catcher tie line revenue requirement for each year of the base case analysis.
- 3-15. Identify the beneficial factors that would offset the drop in market revenues by the proposed new wind facilities when compared to the market revenues forecasted for the Wind Catcher project.
- 3-16. Provide the forecasted base case PTC values for SWEPCO's share of the Wind Catcher project and for the Company's share of the proposed new wind facilities and identify the

beneficial factors that would offset the reduction in PTC value when compared to the Wind Catcher project.

- 3-17. Explain the basis for the forecasted firm capacity rating used for assessing the estimated capacity value of the proposed wind energy facilities and provide workpapers supporting this forecasted value.
- 3-18. Provide total energy supplied by resource type for each year of SWEPCO's current IRP including energy supplied from the proposed new wind facilities separately identified.
- 3-19. Provide the total modeled production costs, and total forecasted benefits (or costs) for each scenario presented on a nominal and NPV basis for the first ten years and for the full 31-year study period of the cost/benefit analysis for SWEPCO's share of the proposed new wind resources.
- 3-20. Provide the total forecasted off system sales margins for each scenario presented on a nominal and NPV basis for the first ten years and for the full 31-year study period of the cost/benefit analysis for SWEPCO's share of the proposed new wind resources.